

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE JPMORGAN PRECIOUS  
METALS SPOOFING LITIGATION

§ Master Docket No. 18-cv-10356 (JGK)  
§  
§ CLASS ACTION

MOTION TO SEAL

The United States respectfully requests permission to file *ex parte* and under seal portions of the government's Unopposed Motion of the United States for an Extension of the Stay. The proposed *ex parte* and sealed portions of the motion contain information related to an ongoing criminal investigation by the United States. Disclosure of that information would be detrimental to the government's investigation because it could lead to destruction of evidence, flight from prosecution, and otherwise interfere with the government's ability to conduct its investigation. Therefore, the information should not be in the public record or shared with the plaintiffs or defendants in this consolidated action. The government has filed a redacted version of its motion on the public docket.

Dated: May 29, 2019

Respectfully submitted,

ROBERT A. ZINK  
Acting Chief

By: /s/ Matthew F. Sullivan  
Avi Perry  
Matthew F. Sullivan  
Trial Attorneys  
Criminal Division, Fraud Section  
U.S. Department of Justice

The application is  
granted.  
So ordered.  
per G/K/sld  
5/30/19 U.S.D.C.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#  
DATE FILED: 5/31/19

1400 New York Ave., NW  
Washington, DC 20530  
(203) 821-3797 (Perry)  
(202) 353-6200 (Sullivan)  
Avi.Perry@usdoj.gov  
Matthew.Sullivan2@usdoj.gov

**CERTIFICATE OF SERVICE**

I, Matthew F. Sullivan, hereby certify that on May 29, 2019, I electronically filed the foregoing Motion to Seal with the Clerk of Court using the CM/ECF electronic filing system, which will automatically send a Notice of Electronic Filing to all parties.

/s/ Matthew F. Sullivan  
Matthew F. Sullivan  
Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice